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September 8, 2017

Hon. Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Sean Price
Cr. Docket No. 17-301 (NGG)

Dear Judge Garaufis:

I represent the Defendant, Mr. Price, in the above-referenced matter. Trial is set for October 16, 2017.

On September 6, 2017, Mr. Price was arraigned on a superseding indictment returned the day before. At the arraignment, without objection from the government, the Court granted my request to supplement the Rule 12 motion previously filed, which would require an amendment to the present motion schedule. On consent, I propose a new schedule as follows: a) defense supplemental motion due by September 15; government opposition due by September 29; c) defense reply by October 4, and; d) oral argument on the earliest date thereafter that is convenient to the Court.

In addition, the parties jointly request a one-week adjournment of the motion *in limine* schedule such that opening motions are due September 15, any opposition is due on September 22 and any replies are due September 27.

Last, I am giving notice to the Court that I intend to request, by Monday, September 11, under separate cover, the CJA appointment of an associate. In short, the volume of material to review and organize is too extensive to handle alone, especially given the immediacy of the trial schedule.

Respectfully submitted,

/s/
James M. Branden